

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

-----X
In re: :
 : In Chapter 11
CIRCUIT CITY STORES, INC., et al., :
 : Bankruptcy No: 08-35653 (KRH)
Debtors. :
-----X

**MOTION FOR ADMISSION *PRO HAC VICE* PURSUANT
TO LOCAL BANKRUPTCY RULE 2090-1(E)(2)**

Elizabeth L. Gunn (“Movant”) hereby moves the Court, pursuant to Local Bankruptcy Rule 2090-1(E)(2), to enter an order, the proposed form of which is attached hereto as **Exhibit A**, authorizing James C. Vandermark, (the “Admittee”), Assistant City Solicitor with the City of Philadelphia (“Philadelphia”), to appear *pro hac vice* in the above-captioned bankruptcy case (the “Bankruptcy Case”) pending before the United States Bankruptcy Court for the Eastern District of Virginia on behalf of Philadelphia. In support of this Motion, the Movant states as follows:

1. Movant is a member in good standing of the Bar of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.
2. Mr. Vandermark is an assistant city solicitor in Philadelphia’s Law Department. Mr. Vandermark has appeared regularly before several bankruptcy courts in chapter 11 cases. He is admitted, practicing, and in good standing as a member of the bar of Pennsylvania and New Jersey. Mr. Vandermark has been practicing law since 2009. There are no disciplinary proceedings pending against Mr. Vandermark. Mr. Vandermark's Application to Qualify as Foreign Attorney is attached hereto as **Exhibit B**.
3. Movant requests that this Court authorize the Admittee to file pleadings in, to appear

Elizabeth L. Gunn, Esquire (VSB No. 71044)
SANDS ANDERSON PC
1111 East Main Street
P.O. Box 1998
Richmond, VA 23218-1998
Telephone: (804) 648-1636
Local Counsel for City of Philadelphia

and be heard at hearings concerning, and to otherwise participate in the Bankruptcy Cases and related proceedings on behalf of Philadelphia.

4. Movant and her law firm shall serve as co-counsel to Philadelphia with the Admittee in the Bankruptcy Case and related proceedings.

5. Notice of this Motion has been given to the Office of the United Trustee and all persons receiving electronic notice in the Bankruptcy Cases as of the service hereof.

WAIVER OF MEMORANDUM OF LAW

6. Pursuant to Local Bankruptcy Rule 9013-1(G), because there are no novel issues of law presented in this Motion, Philadelphia requests that this Court waive the requirement that this motion be accompanied by a written memorandum of law.

NO PRIOR REQUEST

7. No prior request for this Admittee has been made to this Court in these Bankruptcy Cases.

WHEREFORE, Movant respectfully requests that this Court enter an Order in substantially the same form attached hereto as **Exhibit A** authorizing the Admittee to appear *pro hac vice* in the Bankruptcy Cases and grant such other and further relief as is just and proper.

Dated: December 15, 2014

Respectfully submitted,

/s/ Elizabeth L. Gunn

SANDS ANDERSON PC
Elizabeth L. Gunn (VSB No. 71044)
1111 East Main Street, Suite 2400
P.O. Box 1998
Richmond, VA 23218-1998
(804) 648-1636 (Telephone)
(804) 783-7291 (Facsimile)

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of December, 2014, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court for the Eastern District of Virginia, using the CM/ECF system, which thereby caused the above to be served electronically on all registered users of the ECF system that have filed notices of appearance in this matter, and sent via email to the following:

Paula S. Beran, Esquire
Tavenner & Beran, PLC
Counsel to Circuit City Stores, Inc.
Liquidating Trust

Gillian N. Brown, Esquire
Pachulski Stang Ziehl & Jones, LLP
Counsel to the Unsecured Creditors
Committee

Robert VanArsdale, Esquire
Office of the US Trustee

/s/ Elizabeth L. Gunn

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

-----X
In re: :
: In Chapter 11
CIRCUIT CITY STORES, INC., et al., :
: Bankruptcy No: 08-35653 (KRH)
Debtors. :
-----X

**ORDER GRANTING MOTION FOR *PRO HAC VICE*
ADMISSION PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1(E)(2)**

THIS MATTER having come before the Court upon the Motion for Admission *Pro Hac Vice* Pursuant to Local Bankruptcy Rule 2090-1(E)(2) (the “Motion”) filed by Elizabeth L. Gunn with the law firm of Sands Anderson PC, seeking admission pro hac vice for James C. Vandermark of the City of Philadelphia, the Court finds that (i) it has jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. §§ 157 and 1334, (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), (iii) the relief requested in the Motion is in the best interests of the City of Philadelphia, (iv) proper and adequate notice of the Motion and the hearing thereon has been given and that no other or further notice is necessary, and (v) good and sufficient cause exists for the granting of the relief requested in the Motion after having given due deliberation upon the Motion and all of the proceedings had before the Court in connection with the Motion. Therefore,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is granted. Unless otherwise defined herein, capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.
2. James C. Vandermark of the City of Philadelphia is hereby admitted to appear in these Bankruptcy Cases and any related proceedings *pro hac vice* pursuant to Local Bankruptcy Rule 2090-1(E)(2) on behalf of the City of Philadelphia.

ENTERED:

THE HON. KEVIN R. HUENNEKENS
United States Bankruptcy Judge

I ASK FOR THIS:

SANDS ANDERSON PC
Elizabeth L. Gunn (VSB No. 71044)
1111 East Main Street, Suite 2400
P.O. Box 1998
Richmond, VA 23218-1998
(804) 648-1636 (Telephone)
(804) 783-7291 (Facsimile)
Counsel to the City of Philadelphia

RULE 90221-1 CERTIFICATION

I hereby certify that notice of the City of Philadelphia's intent to seek entry of the foregoing proposed order was provided to the parties identified in the Motion and a copy of this proposed order was provided to the Office of the United States Trustee for the Eastern District of Virginia prior to submission to this Court.

SERVICE LIST

Paula S. Beran, Esquire
Tavenner & Beran, PLC
20 North Eighth Street, 2nd Floor
Richmond, VA 23219
*Counsel to Circuit City Stores, Inc.
Liquidating Trust*

Gillian N. Brown, Esquire
Pachulski Stang Ziehl & Jones, LLP
10100 Santa Monica Blvd., 11th Floor
San Francisco, CA 9411
*Counsel to the Unsecured Creditors
Committee*

Robert VanArsdale, Esquire
701 East Broad Street, Suite 4304
Richmond, VA 23219
Office of the US Trustee